

EXHIBIT H

From: Kelley.Storey@lw.com <Kelley.Storey@lw.com>
Sent: Monday, May 16, 2022 1:41 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; truitt.a@wssllp.com
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; Rory.Miller@lockelord.com; SKYRYSEMOOG.LWTEAM@lw.com; Rena Andoh <RAndoh@sheppardmullin.com>; green.a@wssllp.com
Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Kazim,

Thank you for sending this summary. A few notes from us:

Skyryse's Supplemental Discovery Responses:

Without committing to the manner of supplementation, Skyryse is aiming to supplement Interrogatories Nos. 2-10 and RFAs Nos. 1-3 if and as needed by May 26th. We do not see it necessary to schedule a meet and confer before then but will be open to doing so if a need arises.

Skyryse's RFP Responses:

As discussed, Skyryse plans to produce documents consistent with its obligations in discovery and under applicable orders issued by the Court. To the extent the topic of "supplemental productions" came up in our call, this is what we were referring to, not any specific RFPs.

Segregated Files Sent to iDS:

As discussed, Skyryse aims to let you know today the status of our review of the over 11,500 segregated files sent to iDS, but we may need more time.

Thank you for meeting with us and we will be in touch later this week.

Kelley Storey

Pronouns: she/her/hers

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Friday, May 13, 2022 2:55 PM
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Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Counsel—

Thank you for meeting and conferring on various issues. Below is a summary of what was discussed, next steps, and related deadlines.

Moog's Proposed Revised Case Schedule:

Counsel for all defendants are in agreement with the proposed PI hearing date. Counsel for the Individual Defendants will get back to us in writing by today or early next week regarding the other discovery-related deadlines. Counsel for Skyryse will get back to us by Tuesday regarding the discovery-related deadlines.

Skyryse's Supplemental Discovery Responses:

In a May 4 letter, Skyryse committed to supplementing its responses to Interrogatories Nos. 2-10 and RFAs Nos. 1-3. Skyryse believes that supplementation by May 26 is attainable, but it cannot commit today regarding the manner of such supplementation. We expect to receive supplemental responses by May 26. Given that there may be additional issues after receiving the responses, we propose scheduling a further meet and confer on May 31 so that we can crystallize all outstanding issues before Moog's proposed June 2 deadline to submit discovery disputes to the Court. If we determine there are no further issues after receiving the supplemental responses on May 26, then we can cancel the meet and confer. Please let us know your availability on May 31.

Skyryse's RFP Responses:

Skyryse will let us know in writing its positions on each of RFPs Nos. 1-11 by Wednesday.

Skyryse also indicated it was working on "supplemental productions" to be made on May 26, but cannot state what documents will be produced. To be clear, Skyryse has not produced any documents in response to Moog's RFPs, so our understanding is that "supplemental productions" refers to additional documents produced in response to the Stipulated March 11 Order. Please clarify which RFPs the "supplemental productions" pertain to, if any, in Skyryse's written explanation to be provided by Wednesday.

10 Moog Source Code Files:

Skyryse will let us know by Tuesday its position as to whether we can show these documents to our clients and that they will be deemed to have been designated by Moog as AEO-Source Code.

Segregated Files Sent to iDS:

Skyryse will let us know by Monday the status of its review of the over 11,500 segregated files sent to iDS.

Skyryse's Trade Secret Identification Objection:

We discussed our respective positions on this issue. In Skyryse's written response regarding the RFPs to be provided by Wednesday, please clarify for which of Moog's RFPs (if any) Skyryse intends to rely on this objection to not produce responsive documents.

Thank you and have a nice weekend.

Best,
Kazim

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